

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: COMPLAINT

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) MAG. JUDGE NO. 05-824-MASB  
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MOTION TO IMPOUND COMPLAINT

*May 5, 2005*  
The United States of America, by and through its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and Allison D. Burroughs, Assistant U.S. Attorney, hereby moves the Court to impound the complaint, arrest warrant affidavit and other supporting documentation until such time as the Court may, on motion of the United States, order its disclosure.

In support thereof, the government states that the premature disclosure of the complaint and the underlying facts set forth in the affidavit may compromise this investigation, cause the defendant to flee to avoid arrest or otherwise endanger the law enforcement officers who effect the arrest.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

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